

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

BABY DOE, *et al.*,

*Plaintiffs,*

V.

JOSHUA MAST, *et al.*,

*Defendants.*

Case No. 3:22-cv-49-NKM-JCH

**DEFENDANTS JOSHUA AND STEPHANIE MAST’S  
MOTION TO QUASH PLAINTIFFS’ SUBPOENA OF NONPARTY LIBERTY  
UNIVERSITY AND FOR A PROTECTIVE ORDER**

Pursuant to Rules 26 and 45 of the Federal Rules of Civil Procedure, Defendants Joshua and Stephanie Mast hereby move to quash the subpoena duces tecum Plaintiffs served on third-party Liberty University, and for a protective order preventing the production of the subpoenaed materials under Rule 26. The Subpoena on its face seeks privileged communications and documents that are plainly protected under the attorney-client, work product, and marital privileges.

Counsel for Joshua and Stephanie Mast certifies that they conferred in good faith with Plaintiffs' counsel in an attempt to resolve this motion and narrow the areas of disagreement.

Dated: February 25, 2024

Respectfully submitted,

/s/ Michael Francisco

John S. Moran (VSB No. 84326)

Michael L. Francisco (*pro hac vice*)

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